



U.S. Department of Justice

United States Attorney  
Southern District of New York

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

January 31, 2022

Application GRANTED. A change-of -plea conference is hereby scheduled for March 2, 2022, at 10:00 a.m.. Time is excluded in the interests of justice from today, February 1, 2022, until March 2, 2022 for the reasons set forth in the Government's letter. The Clerk of Court is directed to terminate Doc. #43. SO ORDERED.

**BY ECF**

The Honorable Jesse M. Furman  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

A handwritten signature in black ink, appearing to read "Jesse M. Furman".

February 1, 2022

**Re: *United States v. Alan Tejeda-Isabel*, No. 20 Cr. 515 (JMF)**

Dear Judge Furman:

Trial in the above-captioned matter was previously scheduled by the Court for January 10, 2022, but trial did not proceed in light of the District's coordinated trial schedule. The parties have been engaged in productive discussions regarding potential pretrial resolution of this case, and are in the process of working out final details of an anticipated plea agreement. Therefore, the parties respectfully request that the Court schedule a conference in approximately 30 days, at which the parties anticipate the defendant will seek to change his plea and enter a guilty plea. The Government further respectfully requests that the Court exclude time under the Speedy Trial Act, until such date as the Court schedules a change-of-plea conference to permit the parties time to finalize negotiations towards potential pretrial resolution, including allowing defense counsel adequate time to advise the defendant in light of logistical challenges to communication caused by the COVID-19 pandemic and recent Bureau of Prisons restrictions on attorney access, as well as to accommodate defense counsel's upcoming trial schedule. The Government submits that the ends of justice served by the continuance outweigh the best interests of the public and the defendant in a speedy trial. *See* 18 U.S.C. § 3161(h)(7)(A).

I have communicated with defense counsel, who has consented to the above requests.

Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney

By:   
Brett M. Kalikow  
Assistant United States Attorney  
(212) 637-2220

cc: Marisa Cabrera, Esq. (via ECF)